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June 17, 2025

The Honorable Evelyn Padin
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Hangang Global Shipping Co. Ltd. v. Delta Corp Shipping Pte Ltd.*
2:24-cv-11111-EP-MAH

Dear Judge Padin,

We represent the Plaintiff Hangang Global Shipping Co. Ltd. (“Hangang”) in the above-captioned action. We write to provide an update on our current efforts.

As we explained in our last letter, the subject dispute is based on the alleged failure of defendant Delta Corp Shipping Pte Ltd. (“Delta”) to pay hire for the use of the vessel M/V MAPLE MARINA. In connection with filing the Complaint, we applied for and obtained, among other things, an Order and a Writ of Maritime Attachment. We served garnishee bank Valley National in December 2024 with the Complaint, Order and Writ of Maritime Attachment, Order for Appointment of Alternate Process Server, and Interrogatories.

We have since obtained a written confirmation from the garnishee bank that money in a bank account belonging to defendant Delta has been attached in this district. As such, we consider this Honorable Court to have *quasi-in-rem* jurisdiction over defendant Delta and that service on defendant Delta has been perfected by and through attachment of Delta’s property within this district.

We have also reminded the garnishee bank that an answer to our interrogatories served on the bank remains due. These interrogatories inquire about the extent of the relationship between the garnishee bank and Delta, the identification of Delta’s property in the control of the garnishee bank, etc. As such, answers by the garnishee bank are important.

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Given these circumstances, we respectfully request an additional 30 days to work with the garnishee bank to have our interrogatories answered. Accordingly, we propose filing an additional status letter with this Court on or before July 18, 2025. Depending on how things develop, we may in the future serve the defendant by mail pursuant to Rule B(2)(b)-(c) and thereafter move for default judgment.

We thank Your Honor in advance for your continued understanding and assistance. If there are any questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

**Montgomery McCracken
Walker & Rhoads, LLP**
Attorneys for Plaintiff Hangang

/s/ Timothy Semenoro

Timothy Semenoro